

WILLIAM S. AHOLELEI,	)	CIVIL NO. 03 00171 HG-KSC
	)	
Plaintiff,	)	<b>AFFIDAVIT OF LUCY</b>
	)	<b>SEQUEIRA; EXHIBIT "C-1"</b>
vs.	)	
	)	
BARBARA KYSAR; DOCTOR S.	)	
PADERES, DOCTOR BAUMAN;	)	
DOES I-V,	)	
	)	
Defendants.	)	
_____	)	

**AFFIDAVIT OF LUCY SEQUEIRA**

STATE OF HAWAII )  
)  
CITY & COUNTY OF HONOLULU )

LUCY SEQUEIRA, being first duly sworn on oath, deposes and says:

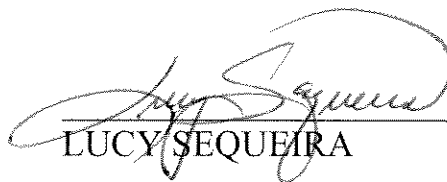
1. I am employed by the Department of Public Safety, State of Hawai'i as a Medical Records Librarian at the Oahu Community Correctional Center ("OCCC"), and have been employed in that capacity since December 1999.
2. As such, I am the supervisor of active and archive sections of the health information unit.
3. I have personal knowledge of the matters set forth herein and am competent to so testify.

**EXHIBIT "C"**

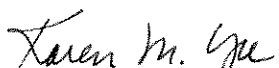
4. In the course and scope of my employment, I have access to the medical records of inmates at the OCCC, including those of Plaintiff William S. Aholelei ("Plaintiff").

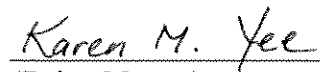
5. Attached hereto as Exhibit "C-1" is a true and correct portion of the medical records of Plaintiff, which records are incorporated herein by reference.

FURTHER AFFIANT SAYETH NAUGHT.

  
LUCY SEQUEIRA

Subscribed and sworn to before me  
this 1st day of August, 2006.

  
Notary Public, State of Hawai'i

  
(Print Name)

My commission expires: 1-9-2010

